IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF ARIZONA

IN RE: Bard IVC Filters Products Liability
Litigation

MDL NO. 2:15-md-02641-PHX-DGC

STIPULATION OF DISMISSAL
WITH PREJUDICE

Cain, Lance v. C.R. Bard Inc., et al.,
Case No.: 2:16-cv-00446-PHX-DGC

STIPULATION OF DISMISSAL WITH PREJUDICE

COMES NOW, Plaintiff, Lance Cain ("Plaintiff") and Defendants C.R. Bard, Inc. and Bard Peripheral Vascular, Inc. ("Defendants"), file this Stipulation of Dismissal with Prejudice, and in support thereof, respectfully show the Court as follows:

Pursuant to Federal Rule of Civil Procedure 41(a)(1)(A)(ii), Plaintiff and Defendants hereby stipulate to the dismissal of this case with prejudice to the re-filing of same. Plaintiff and Defendants further stipulate that they are to bear their own costs.

WHEREFORE, PREMISES CONSIDERED, Plaintiff and Defendants hereby respectfully request that the Court dismiss this case in its entirety with prejudice to the re-filing of same and order that these parties are to bear their own costs.

Respectfully submitted this 26th day of October, 2020.

s/Eric D. Holland
Eric D. Holland
Eric D. Holland
eholland@hollandtriallawyers.com
HOLLAND LAW FIRM
300 N. Tucker Blvd., Suite 801
St. Louis, MO 63101
P: 314-241-8111
F: 314-241-5554
Attorneys for Plaintiff, Lance Cain

s/Richard B. North, Jr.
Richard B. North, Jr.
richard.north@nelsonmullins.com
NELSON MULLINS RILEY &
SCARBOROUGH LLP
201 17th St. NW, Ste. 1700
Atlanta, GA 30363
P: 404.322.6000
F: 404.332.6397
Attorneys for Defendants C. R. Bard, Inc. and Bard Peripheral Vascular Inc.

CERTIFICATE OF SERVICE

I hereby certify that on October 26, 2020, I electronically filed the foregoing document with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the CM/ECF participants registered to receive service in this MDL.

s/Eric D. Holland
Eric D. Holland
eholland@hollandtriallawyers.com
HOLLAND LAW FIRM
300 N. Tucker Blvd., Suite 801
St. Louis, MO 63101
P: 314-241-8111
F: 314-241-5554

Attorneys for Plaintiff, Lance Cain